

EXHIBIT 12

SHIRLEY SARMIENTO

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST by and through
MARIELLE SHAVONNE SMITH and CHARIS HUMPHREY
on behalf of its members, SHAKETA REDDEN,
DORETHEA FRANKLIN, TANIQUA SIMMONS, DE'JON HALL,
JOSEPH BONDS, CHARLES PALMER, SHIRLEY SARMIENTO,
EBONY YELDON, and JANE DOE,
individually and on behalf of a class of all
others similarly situated,

Plaintiffs,

-vs-

CITY OF BUFFALO, N.Y., BYRON B. BROWN,
Mayor of the City of Buffalo, in his individual and
official capacities,
BYRON C. LOCKWOOD, Commissioner of the
Buffalo Police Department, in his individual
and official capacities,
DANIEL DERENDA, former Commissioner of the
Buffalo Police Department, in his individual capacity,
AARON YOUNG, KEVIN BRINKWORTH, PHILIP SERAFINI,
ROBBIN THOMAS,
UNKNOWN SUPERVISORY PERSONNEL 1-10,
UNKNOWN OFFICERS 1-20, each officers of the
Buffalo Police Department,
in their individual capacities,

Defendants.

1 Q. Okay. How often would you say you drive?

2 A. When, like during the week or --

3 Q. Yes. During the weekdays, from Monday to Friday,
4 about how often would you say you drive?

5 A. I really can't say, pinpoint it.

6 Q. Would you say that you drive on a daily basis?

7 A. Every other day or something like that.

8 Q. So you don't drive every single day, but it would
9 be rare that a week would go by where you didn't
10 drive at all?

11 A. Correct.

12 Q. Okay. When was the last time you received a
13 ticket for a vehicle and traffic violation?

14 A. The last time I got one from them, or whatever,
15 the people -- from the city people.

16 Q. Okay. And we're going to talk about some of the
17 instances alleged in your Complaint, but I guess
18 I'll ask it this way. In the past year, have you
19 received any citation or ticket for a violation
20 of the Vehicle and Traffic Law?

21 A. No.

22 Q. How about in the past two years?

23 A. No.

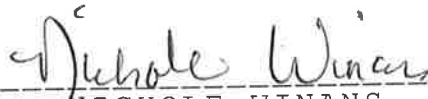
1 STATE OF NEW YORK)

2 SS:

3 COUNTY OF ERIE)

4
5 I, Nichole Winans, a Notary Public in and
6 for the State of New York, County of Erie, DO
7 HEREBY CERTIFY that the testimony of SHIRLEY
8 SARMIENTO was taken down by me in a verbatim
9 manner by means of Machine Shorthand, on December
10 13, 2022. That the testimony was then reduced
11 into writing under my direction. That the
12 testimony was taken to be used in the
13 above-entitled action. That the said deponent,
14 before examination, was duly sworn by me to
15 testify to the truth, the whole truth and nothing
16 but the truth, relative to said action.

17 I further CERTIFY that the above-described
18 transcript constitutes a true and accurate and
19 complete transcript of the testimony.

20
21 
22 _____
23 NICHOLE WINANS,
Notary Public.